UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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January 18, 2012

Mr. Paul Rumelhart
Kootenai Business Park Industrial District
P.O. Box 1071
Libby, MT 59923

Subject: Libby Asbestos Superfund Site
Operable Unit 5 – Former Stimson Lumber Property
Wood Chip Piles

Dear Mr. Rumelhart:

This letter is to provide you with an update on the Environmental Protection Agency's (EPA's) investigations on the wood chip piles located on the former Stimson Lumber property. The EPA completed a number of studies during 2011 to further clarify potential exposures from these materials.

In 2009, the EPA provided you with all data we had available related to the wood chip piles on the Former Stimson Lumber property, Operable Unit 5 of the Libby Asbestos Superfund Site. In 2007 the EPA collected 12 Activity Based Samples (ABS) (personal air samples collected for a scenario characterizing wood chip pile workers) and 20 bulk samples during a wood chip sampling event. Libby Amphibole asbestos (LA) was not detected in any of the 12 personal air samples. Using the polarized light microscopy (PLM) method, one of the 20 bulk samples contained a detectable concentration of LA. Using the transmission electron microscopy (TEM) method, four of the 20 bulk samples contained a detectable concentration of LA.

Due to the qualitative nature of the sample analysis methods used in 2007, the EPA was not able to determine the LA concentration in the samples where LA was observed, only that LA was present. In addition, results based on this qualitative analysis method did not provide information on whether or not disturbances of wood chips under typical residential disturbance scenarios would result in unacceptable inhalation exposures.

In August 2011, EPA collected both bulk and ABS samples to quantitatively characterize the wood chip piles. Wood chips were collected from five locations within

the two existing wood chip piles. (See figure in the enclosed technical memorandum.) For each of the five locations where wood chips were collected, three bulk samples were collected and three ABS events were conducted. Activities included spreading, raking and digging the wood chips, as might be expected in typical residential uses.

Wood chip bulk sampling and ABS were completed August 30, 2011. Bulk material samples and personal air samples were submitted for analysis using TEM, as outlined in the Sampling and Analysis Plan 2011 Miscellaneous Activity-based Sampling (CDM, August 2011). For the bulk samples, one of 15 results showed the presence of LA at a concentration of 2.3×10^{5} structures/gram. The estimated LA concentration as a mass percent is 0.000012%. For the ABS personal air samples, LA was not detected in any of the 15 samples. Please see the enclosed technical memorandum, which more fully describes the sampling event and analytical results.

EPA's recent sampling has confirmed the presence of a small amount of LA fibers in the wood chip piles. The ABS samples for spreading, raking, and digging the wood chips show no measured exposure. Based on this information, the EPA anticipates no further evaluation of the wood chip piles.

If you need any further information, please call me at (303) 312-6552.

Sincerely,

Rebecca J. Thomas
Project Manager

Enclosure

cc: Victor Ketellapper, EPR-SR
Mike Cirian, Libby Information Office
David Berry, EPR-SR